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*Xoom Corporation, John Kunze,*  
*and Ryno Blignaut*

*(Additional counsel on signature page)*

**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
**SAN JOSE DIVISION**

ALEXANDER LIU, Individually and On Behalf of  
All Others Similarly Situated,

Plaintiff,

v.

XOOM CORP., JOHN KUNZE, AND RYNO  
BLIGNAUT,

Defendants.

Case No. 5:15-cv-00602-LHK

CLASS ACTION

**STIPULATION AND ~~PROPOSED~~**  
**ORDER RELATING CASES**

**(Civil L.R. 3-12, 7-11 & 7-12)**

Courtroom: 8 - 4th Floor  
Judge: Honorable Hon. Lucy H. Koh

**[MOTION FOR ADMINISTRATIVE  
RELIEF TO CONSIDER WHETHER  
CASES SHOULD BE RELATED FILED  
CONCURRENTLY]**

1 WHEREAS, on January 6, 2015 plaintiff Alexander Liu filed a putative class action complaint  
 2 alleging violation of the Securities Act of 1933 against Xoom Corporation (“Xoom” or the  
 3 “Company”), John Kunze, and Ryno Blignaut (collectively, “Defendants”), in the Superior Court of  
 4 the State of California in San Francisco County (“*Liu* State Action”);

5 WHEREAS, the *Liu* State Action was filed ostensibly on behalf of all similarly-situated  
 6 individuals who purchased common stock of Xoom allegedly “pursuant and/or traceable to [Xoom’s]  
 7 Registration Statement and Prospectus, declared effective by the SEC on February 14, 2013, issued in  
 8 connection with [Xoom’s] Initial Public Offering (the ‘IPO’).” *Liu* Complaint ¶ 1.

9 WHEREAS, on February 6, 2015, Defendants removed the *Liu* State Action to this Court,  
 10 now captioned *Liu v. Xoom et al.*, Case No. 5:15-cv-00602-LHK (“*Liu*”);

11 WHEREAS, on March 11, 2015 plaintiff Patrick Andrew Barrett filed a putative class action  
 12 complaint alleging violation of the Securities Act of 1933 against the same Defendants, in the  
 13 Superior Court of the State of California in San Francisco County (“*Barrett* State Action”);

14 WHEREAS, like the *Liu* State Action, the *Barrett* State Action was also filed ostensibly on  
 15 behalf of the same putative class – i.e., all similarly-situated individuals who purchased common  
 16 stock of Xoom allegedly “pursuant and/or traceable to [Xoom’s] Registration Statement and  
 17 Prospectus, declared effective by the SEC on February 14, 2013, issued in connection with [Xoom’s]  
 18 Initial Public Offering (the ‘IPO’).” *Barrett* Complaint ¶ 1.

19 WHEREAS, on March 20, 2015, Defendants removed the *Barrett* State Action to this Court,  
 20 now captioned *Liu v. Xoom et al.*, *Barrett v. Xoom Corp., et al.*, Case No. 5:15-cv-01319-VC  
 21 (“*Barrett*”);

22 WHEREAS, the complaints in both the *Liu* action and the *Barrett* action – which contain  
 23 substantially the same allegations – allege that Xoom’s February 14, 2013 Registration Statement and  
 24 Prospectus contained material misstatements and/or omissions regarding its internal controls, and  
 25 seek to assert claims under Sections 11 and 15 of the Securities Act of 1933, 15 U.S.C. §§ 77k and  
 26 77o;

27 WHEREAS, the *Liu* action is currently assigned to the Honorable Lucy H. Koh, while the  
 28 subsequent *Barrett* action is assigned to the Honorable Vince Chhabria; and

1 WHEREAS, the parties believe the actions should be related because (1) they involve  
2 substantially the same parties, property, transactions and events; and (2) it appears likely that there  
3 will be an unduly burdensome duplication of labor and expense or conflicting results if the cases are  
4 conducted before different Judges.

5 IT IS ACCORDINGLY STIPULATED, by and between the parties hereto, that:

6 1. Pursuant to Civil Local Rules 3-12, 7-11 and 7-12, the *Barrett* action should be  
7 related to the *Liu* action and assigned to the Honorable Lucy H. Koh; and

8 2. Judge Koh's ruling on the pending remand motion in the first filed *Liu* action will  
9 also apply to the second, related *Barrett* action.

10 Dated: March 25, 2015

11 Respectfully submitted,

12 **GOODWIN PROCTER LLP**

13 By: /s/ Brian E. Pastuszenski

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25 **AND RYNO BLIGNAUT**

1 Dated: March 25, 2015

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9 Dated: March 25, 2015

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1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

2  
3  
4 ENTERED: March 26, 2015

  
HONORABLE LUCY H. KOH  
UNITED STATES DISTRICT JUDGE